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February 28, 2006

## COMPLIANCE LETTER

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: In the Matter of IP-Enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196**

Dear Ms. Dortch:

This letter provides an update on progress made by Verizon and Verizon Business in providing E911 capability to the customers of Verizon's interconnected VoIP services.<sup>1</sup> Verizon and Verizon Business fully support the Commission's efforts to ensure public safety through its *VoIP 911 Order*.

### Verizon Voice over IP<sup>2</sup>

As previously explained, Verizon Business provides E911 capability to all of its Verizon Voice over IP customers at their fixed locations and has not added new customers to this service after November 28 in areas where it does not have E911 capability.

In addition, as previously explained, on November 28, 2005, we implemented software-based processes that automatically notify Verizon Business when an end user attempts to use his or her IP-enabled CPE at a location other than the subscriber's Registered Location. When Verizon Business detects that a subscriber may have moved to a new location, Verizon Business suspends service until we are able to confirm that the equipment is still at the same location, or until the customer reestablishes service at a new registered location within our E911 coverage area.

As previously explained, Verizon Business is unable to detect potential moves for a small subset of Verizon Voice over IP subscribers because of a design flaw discovered after November 28.<sup>3</sup> These

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<sup>1</sup> See Letter from Susanne A. Guyer, Verizon, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Oct. 21, 2005); Letter from Richard S. Whitt, MCI, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Oct. 21, 2005).

<sup>2</sup> This service was formerly called "MCI Advantage."

<sup>3</sup> Letter from Amy Wolverton, MCI, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Dec. 21, 2005).

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subscribers continue to have full E911 capability at their Registered Locations in accordance with the *VoIP 911 Order*. Until Verizon Business is able to resolve this situation, these customers are treated as "grandfathered" customers, and Verizon Business will make contributions to the Public Safety Foundation of America and the Fraternal Order of Police Foundation in accordance with MCI's October 21 Letter.

#### Neighborhood Broadband Calling

As previously explained, Verizon provides E911 capability to all of its Neighborhood Broadband Calling customers at their fixed locations and has not added new customers to this service after November 28 in areas where it does not have E911 capability.

In addition, as previously explained, on November 28, 2005, we implemented software-based processes that automatically notify Verizon when an end user attempts to use his or her IP-enabled CPE at a location other than the subscriber's Registered Location. When Verizon detects that a subscriber may have moved to a new location, Verizon suspends service until we are able to confirm that the equipment is still at the same location, or until the customer reestablishes service at a new registered location within our E911 coverage area.

As noted in MCI's December letter, Neighborhood Broadband Calling customers may now take advantage of a user-friendly voice-prompt procedure to restore service after service has been suspended because of Verizon's detection of a potential change in location. The voice prompt obviates the need for customers who have not moved to contact customer service.

#### Verizon VoiceWing

As of February 21, 2006, Verizon is able to offer E911 services to over 56 percent of its customers. These include customers whose 911 calls are routed through selective routers to PSAPs with full E911 capabilities as well as customers whose 911 calls are routed through selective routers to PSAPs that cannot receive and process Registered Location information.

As we previously explained, Verizon is only accepting new customers for VoiceWing service in areas where its vendor is capable of providing E911 services (as defined above) or in areas served by a PSAP that is not connected to the existing Wireline E911 system. In addition, as confirmed in our November 28 compliance letter, Verizon has implemented an automatic detection capability that will identify when a customer may have moved her or his location. This capability is in place for all existing VoiceWing customers.

If you have any questions, please do not hesitate to call me.

Sincerely,



cc: Ian Dillner  
Tom Navin  
Kirk Burgee  
Kathryn Berthot  
Janice Myles  
Christi Shewman